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From: Dermer, Michele
Sent: Tue 11/17/2015 6:48:05 PM
Subject: Summary of technical meeting with DOGGR, Water Board and RB 5

Monday, November 16, 2015

Attendees: John Borkovich, Rob Habel, Al Walker, Jerry Salera, Brandon Schliegel, Lisa McWhirter, Michele Dermer, Dale Harvey and Alan Cregen on the phone from RB 5.

Rob started off the meeting introducing Al Walker as the new DOGGR UIC director. Rob will now be special assistant to Steve Boehlen, his main focus are the new regulations and rulemaking, plus other topics including advising on AE packages, coordination with the Water Board and EPA. This new structure became effective last Thursday. Also, Bill Bartling is the new D4 Deputy; John Garosh is no longer acting.

I began with a request to add three agenda topics – 1) request for scheduling a meeting to discuss current source proposed approach, 2) update on project-by-project reviews and prioritization and; 3) the rescheduling of the Thursday meeting from the afternoon to the morning.

The Water Board is not able to make a morning meeting on Thursday, so the meeting must remain at 1pm. As a side note, the Water Board is not accepting email invitations to meetings. If we wish to schedule a meeting we are better off using Outlook calendar. Thus, if we want to propose a new time for a meeting use “propose new time” through Outlook.

We reversed the agenda because RB5 was on the phone and began with Alon.

Alon – I described the status of the package and EPA’s review. Dale is reviewing the package, has comments, and will discuss them with Clay on Friday. They offered to provide their comments to EPA early next week. I indicated that we found the application incomplete and mentioned a few of the problems with it. I will follow up next week on that. In the meantime

David and ORC have my draft comments and transmittal letter.

As part of the Alon discussion, RB5 and Water Board noted that there was a similar issue with San Joaquin Refinery. I told them we were aware of the issues but we were in the early stages of working with them. I understand from talking with Joel this morning that we have a draft letter for the operator, but it's not been issued yet. When it does get issued or , coordinate with the State.

8 Additional wells – since we were on the topic of wells that need a Class I permit, Rob brought up that DOGGR has identified 8 wells the Division believes were improperly permitted as Class II wells and should in fact be permitted by EPA as Class I disposal wells. They include wells associated with Co-gen plants. Inergy? They believe these will have to transfer to EPA.

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Elk Hills – Water Board has been meeting frequently with CRC. CRC has been unwilling to leave any documentation with the Water Board to be reviewed once they've made a presentation. Jonathan B is briefing Secretary Rodriguez often so he is aware of the status. There has essentially been no progress in resolving the issue. Speculation from the Division that resolution will not come until right before Feb 2017 shutdown date. EPA has tied its Class I permit issues to the State's resolution of this issue. It was expected to be resolved by the end of this year, this is very unlikely.

AE packages status – there is no tracking system for planning purposes for incoming applications. Once a package is received there is a tracking system. They do not have an accurate picture of the universe of packages to come in. I mentioned Mike's offer of EPA assistance – if there was something EPA can do to move the process along – such as meeting with the industry associations, etc. State would like to discuss this with Mike/EPA at Thursday's meeting. We all share the concern about the lack of progress and the shut-in date.

Within the next month or two expect several more packages – Cat Canyon, Round Mountain, Tejon, Lynch Cyn, San Ardo (Aera); also coming from D. 4 – one huge package to include three fields – Midway Sunset, McKittrick and Cyrmric. DOGGR expects to have a better idea of the submittal schedules for these packages in mid- December, by our next monthly meeting.

Arroyo Grande AE package- Rob is preparing the responses to comments, Water Board is reviewing the final statement of basis. Will go out next week for additional 15 day comment period. Expect to get to EPA after Thanksgiving, by early December. Comments are being

placed into categories and responded to in groups.

Detailed EPA questions on spreadsheets – we discussed the detailed questions by EPA. Water Board will follow up with a written response to the questions we asked in Item #3. Jerry Salera prepared responses to most of the questions we asked in Items 1, and 5. I said I would review his answers and see if I had any follow-up questions. Regarding Item 4 – our question was about category 2 wells – Jerry asked me to clarify the question, which I did and he said he would prepare a response. Regarding Item #2 – in which we asked about the shut in date for the 11 HTAE wells – Rob agreed the date on the spreadsheet of Feb 2017 was incorrect. It should be Dec 2016 and they will need to update the spreadsheets.

This spurred another agenda item – the mechanism to handle the 11 HTAE – we agreed to add this topic to the agenda for Thursday's meeting when the attorneys would be present. It was my recollection that the attorney's had been meeting separately on this and had advanced a proposal to handle this.

Please let me know if you have any questions. Based on the meeting's outcome and other items we are tracking I will send you a draft agenda for Thursday's meeting next. Also, Lisa may have items to add, please do.

Michele

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